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Via ECF

March 20, 2024

Hon. Dale E. Ho, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *Santiago v. Umbrella Management LLC, et al.*
Case No.: 1:23-cv-2673 (DEH)(SLC)

Dear Judge Ho,

We represent Plaintiff in the above-referenced matter and write jointly with counsel for Defendants to request a one-week extension of time, until March 27, 2024, to file the parties' settlement agreement for court approval. *See Cheeks v. Freeport Pancake House, Inc.*, 796 F.3d 199, 206 (2d Cir. Aug. 7, 2015).

Pursuant to the Court's Order, the parties' application for judicial approval is due on March 20, 2024. While the parties have worked to meet that deadline, we require additional time to finalize the language of the settlement agreement and to allow for execution prior to filing of the *Cheeks* motion. There have been no prior requests for an extension of this date.

Thank you for your time and consideration.

Respectfully Submitted,

Application GRANTED.

/s/ Clara Lam
Clara Lam, Esq. (CL6399)

The parties shall file their materials for judicial approval under *Cheeks v. Freeport Pancake House, Inc.*, 796 F.3d 19 (2d Cir. 2015), by **March 27, 2024**.

cc: All Parties via ECF

The Clerk of Court is respectfully requested to close ECF No. 39.

SO ORDERED.



Dale E. Ho
United States District Judge
Dated: March 21, 2024
New York, New York